

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Vernon Robert Ancrum,  
Debtor

Fay Servicing, LLC as servicer for  
LSF9 Master Participation Trust,  
Movant  
v.

Vernon Robert Ancrum  
Angela Ancrum-Co-Debtor  
Scott F. Waterman- Trustee,  
Respondents

Case No.: 21-11568-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing Date: December 1, 2021 at 11:00 am

Objection Deadline: November 22, 2021

**NOTICE OF MOTION FOR RELIEF FROM  
AUTOMATIC STAY AND CO-DEBTOR STAY**

Fay Servicing, LLC as servicer for LSF9 Master Participation Trust has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 419 W Earlham Terrace, Philadelphia, PA 19144.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 22, 2021 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court  
United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lorraine Gazzara Doyle  
Friedman Vartolo, LLP  
1325 Franklin Avenue, Suite 230  
Garden City, NY 11530  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on the 1st day of December 2021, at 11:00 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: November 8, 2021

By: /s/ Lorraine Gazzara Doyle  
Lorraine Gazzara Doyle, Esq.  
FRIEDMAN VARTOLO LLP  
Attorneys for Movant  
1325 Franklin Avenue, Suite 230  
Garden City, New York 11530  
T: (212) 471-5100  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

TO:

**Trustee**

Scott F. Waterman (Chapter 13)  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

**Debtor's Counsel**

David M. Offen, Esquire  
The Curtis Center  
601 Walnut Street  
Suite 160 West  
Philadelphia, PA 19106

**U.S. Trustee**

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

**Debtor**

Vernon Robert Ancrum  
419 West Earlham Terrace  
Philadelphia, PA 19144

**Co-Debtor**

Angela Ancrum  
419 West Earlham Terrace  
Philadelphia, PA 19144